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TO: John Wrubel, American Cyanamid

DATE: March 17, 1998

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PAGES: 52 inc. Cover

FROM: Jason Robertson

USEPA/OPP/SRRD/RBII

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RE: PHORATE: Revised HED Science Chapter

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OPP PUBLIC EXCISE

John,

Here's the HED Science Chapter that we discussed this morning. Please call me if you have any immediate questions or comments. I spoke with Kathy Monk (Branch Chief, RBII) this afternoon and we agreed that your company should be given an opportunity to respond to the comments in the chapter; however we have not yet determined what format the comments should take (please feel free to e-mail your suggestions, and I'll see what we can work out). I will mail a copy of this report to you with SRRD's comments by March 27. The basic issues that we're likely to comment on are that:

- The Haz ID findings are unlikely to be changed due to internal Agency policy changes.
- SRRD is aware that HED's comments re label amendments and tolerance reassessments are directed at a moving target and that your company has shown a good faith attempt to comply with the relevant DCI's.
- The final RED for Phorate has been delayed indefinitely as OPP determines how the Organophosphates will be regulated.
- HED determined that the acute dietary risk for phorate based on the Monte Carlo analysis exceeds the Agency's level of concern for all population groups at the 99.9 percentile level. Though the risk is below the level of concern at the 95 percentile level, SRRD is unlikely to regulate at this level.

A final note: as I mentioned to you this morning, I will be leaving the Agency on April 28; however, all comments should still be routed through me in the meantime.

Regards,

Handwritten signature of J. P. R. A.

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